

# **Appendix L**

FPC-DE FILE: OM130600 Operations Manual	LEVEL 3 DOCUMENTATION WORK INSTRUCTION OM-130.600 SPILL PREVENTION CONTROL, CONTAINMENT AND COUNTERMEASURES PLAN	Page 1 of 9  <b>CONFIDENTIAL</b>
---	--	--

**DISTRIBUTION**

Same as Operations Manuals  
Environmental Manager

**1.0 POLICY**

- 1.1 It is the policy of FPC-DE to prevent spills of oil by engineering design and operating systems. Furthermore it is FPC-DE position to commit resources to respond to emergencies in order to protect the health and safety of employees, the community and the environment. The undersigned has the full approval of management to commit the necessary resources to fully implement this Plan.

\_\_\_\_\_  
Plant Manager, FPC-DE

**2.0 SCOPE**

The scope of this procedure will cover the systems and procedures relating to compliance with the requirements of 40 CFR 112.7.

**3.0 RESPONSIBILITY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**4.0 FLOW CHART**

- 4.1 None

**5.0 REFERENCE**

- |     |            |  |
|-----|------------|--|
| 5.1 | SA2118     | Emergency Response Plan                            |
| 5.2 | OM-268.100 | Dike and Transformer Inspection                    |
| 5.3 | OM-130.100 | Receiving Bulk Shipments                           |
| 5.4 | SA2103     | Environmental, Health & Safety Incident Management |

**6.0 PROCEDURE**

MAINTAINED BY: Environmental Manager  
APPROVED BY: Plant Manager

REVISED DATE: 1/20/05  
EFFECTIVE DATE: 9/27/01

[illegible]

Potential for spills is minimized by engineering controls and regular inspection.

[REDACTED]

Document is uncontrolled unless one of the following appears: a red stamp stating "Controlled Document" or "Revised-Destroy All Other Copies" or a red FPC logo in the center of the page.

FPC-DE FILE: OM130600 Operations Manual	LEVEL 3 DOCUMENTATION WORK INSTRUCTION OM-130.600 SPILL PREVENTION CONTROL, CONTAINMENT AND COUNTERMEASURES PLAN	Page 3 of 9  <b>CONFIDENTIAL</b>
---	--	--

[REDACTED]

6.3 Adjacent Receiving Waters

- 6.3.1 Dragon Run is located approximately 0.9 miles southwest of the plant site. Based on engineering design, routine inspection and existing operating procedures, it is considered unlikely that storm water or spilled material would reach Dragon Run. The stormwater drainage system is designed to be able to collect a 24-hour, 99-year storm event and collected stormwater is treated at the WWTP.
- 6.3.2 Delaware River – Under the site's NPDES permit, treated water is discharged from outfall 001 to the refinery's sluiceway. The sluiceway eventually discharges to the Delaware River at a point approximately five miles from the plant. In order to prevent a release, outfall 001 can be shutoff and recycled back to the plant in the case of a spill emergency.

6.4 Environmentally Sensitive areas: None identified by the plant

6.5 Public intake waters: None identified by the plant.

[REDACTED]

[REDACTED]

[REDACTED]

MAINTAINED BY: Environmental Manager  
APPROVED BY: Plant Manager

REVISED DATE: 1/20/05  
EFFECTIVE DATE: 9/27/01

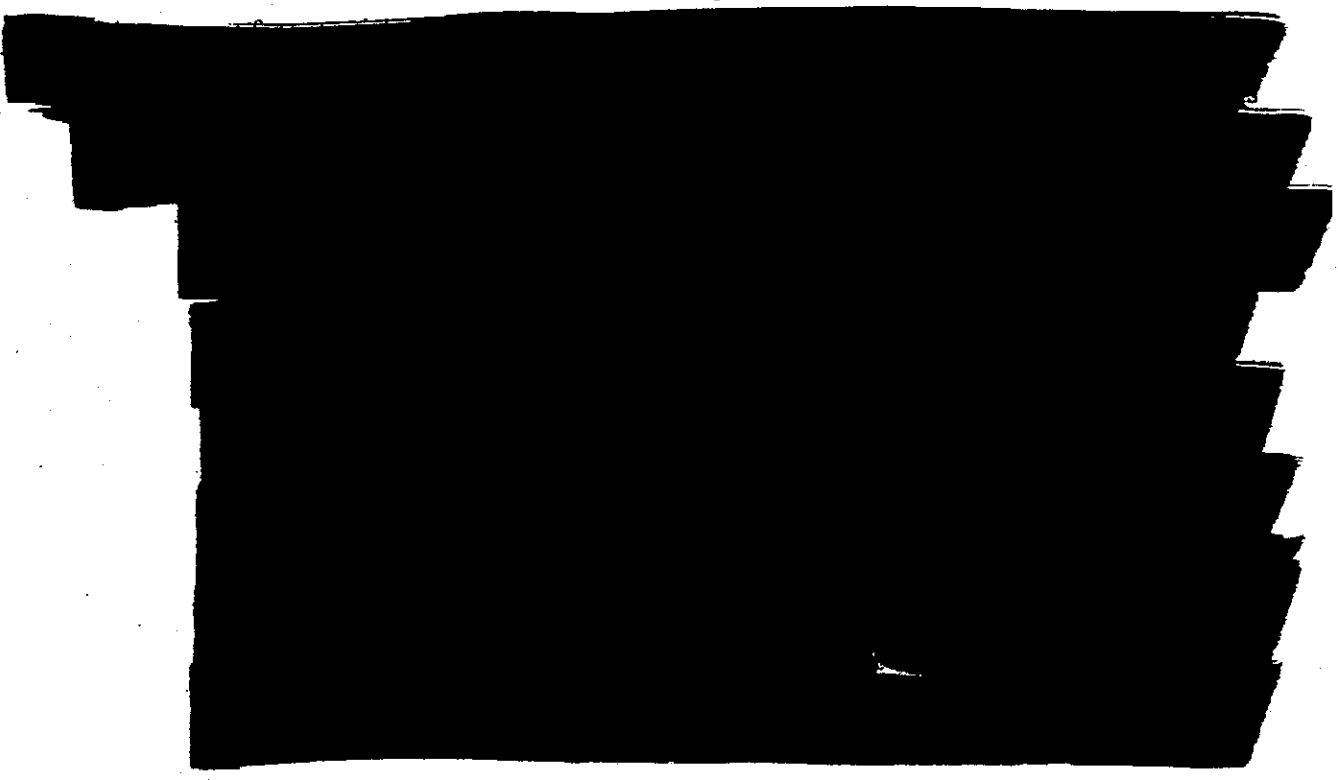
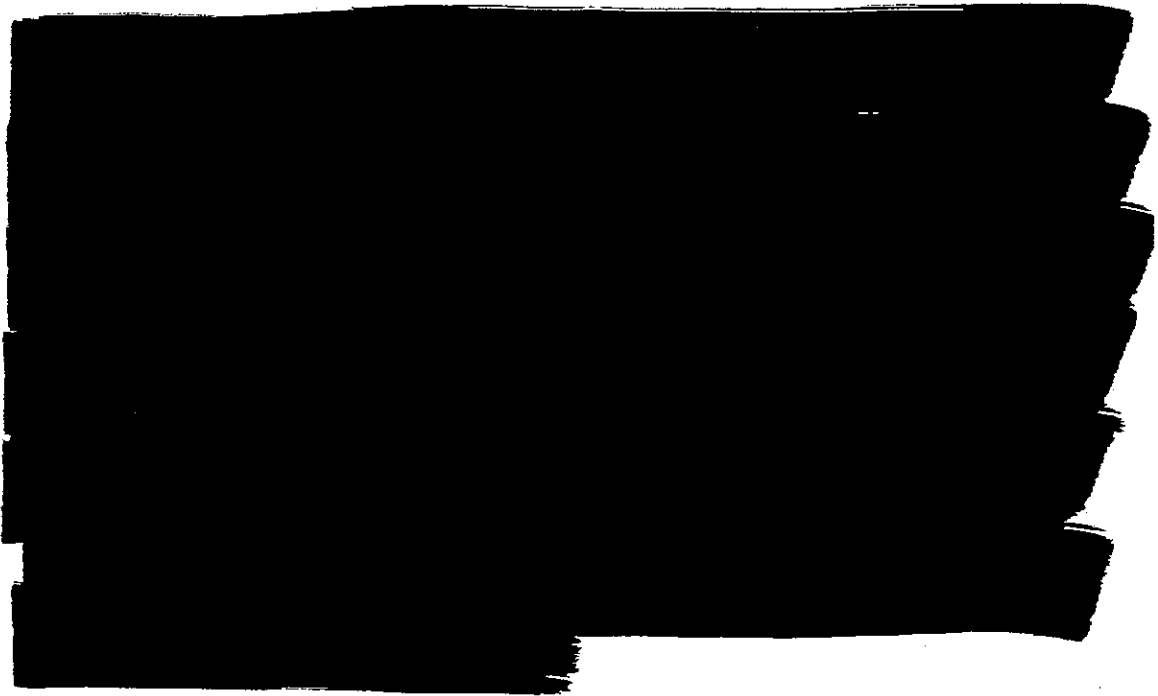
Page 4 of 9

**CONFIDENTIAL**

[REDACTED]

Document is uncontrolled unless one of the following appears: a red stamp stating "Controlled Document" or "Revised-Destroy All Other Copies" or a red FPC logo in the center of the page.

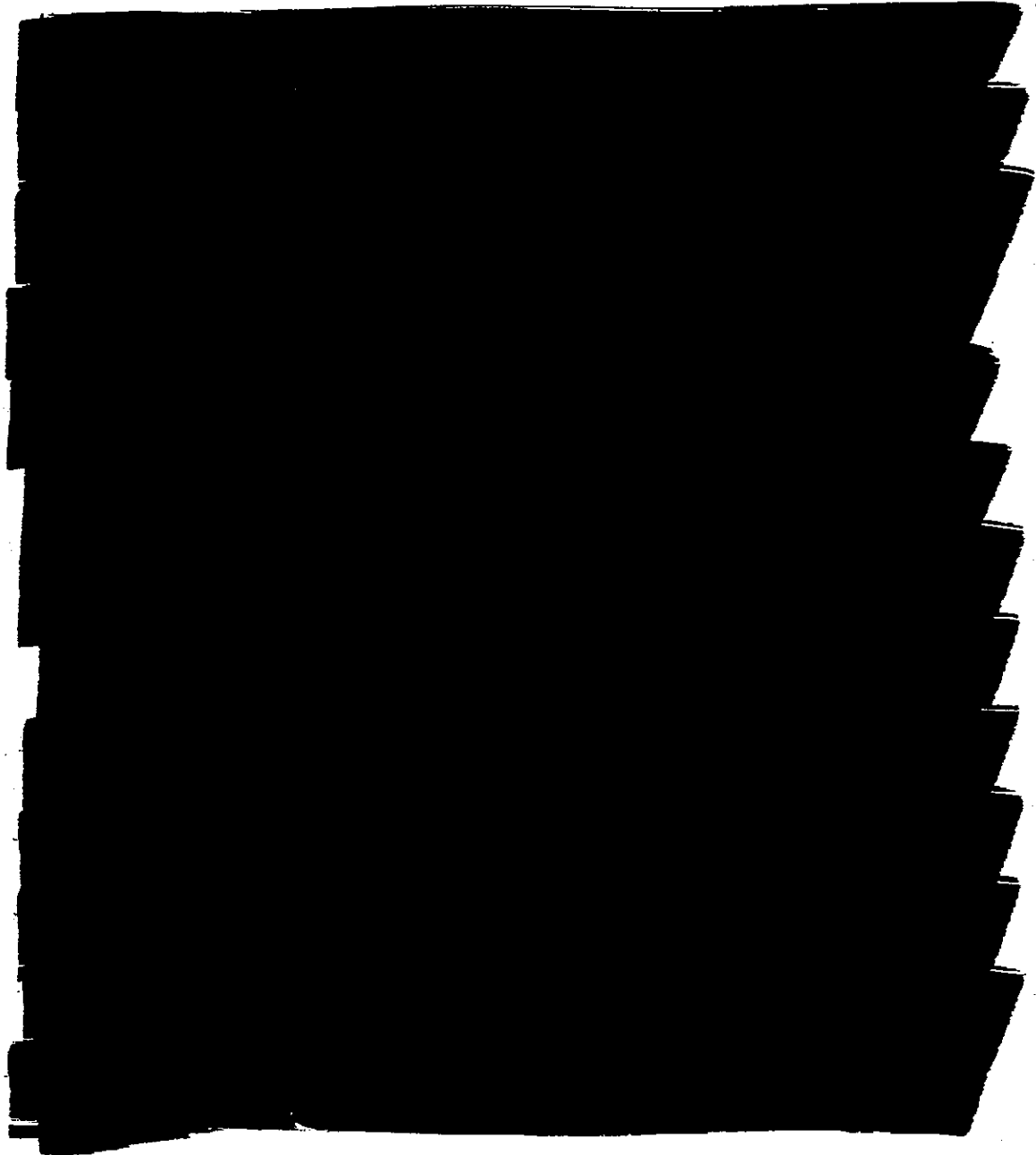
FPC-DE FILE: OM130600 Operations Manual	LEVEL 3 DOCUMENTATION WORK INSTRUCTION OM-130.600 SPILL PREVENTION CONTROL, CONTAINMENT AND COUNTERMEASURES PLAN	Page 5 of 9  <b>CONFIDENTIAL</b>
---	--	--



MAINTAINED BY: Environmental Manager APPROVED BY: Plant Manager	REVISED DATE: 1/20/05 EFFECTIVE DATE: 9/27/01
--	--

FPC-DE FILE: OM130600 Operations Manual	LEVEL 3 DOCUMENTATION WORK INSTRUCTION OM-130.600 SPILL PREVENTION CONTROL, CONTAINMENT AND COUNTERMEASURES PLAN	Page 6 of 9  <b>CONFIDENTIAL</b>
---	--	--

6.11.3 Spill Response - the following steps will be taken should a spill occur:

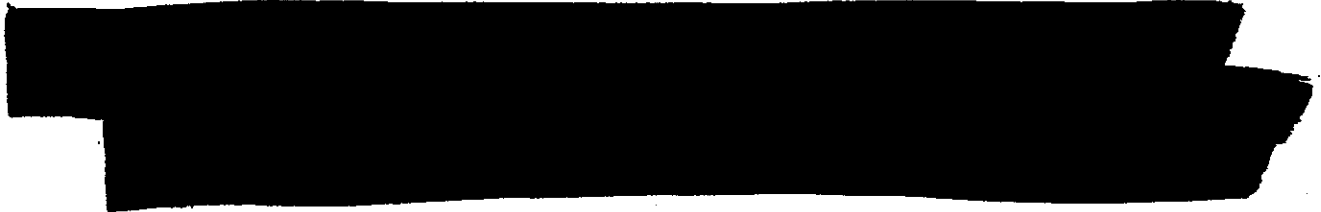


MAINTAINED BY: Environmental Manager  
APPROVED BY: Plant Manager

REVISED DATE: 1/20/05  
EFFECTIVE DATE: 9/27/01

FPC-DE FILE: OM130600 Operations Manual	LEVEL 3 DOCUMENTATION WORK INSTRUCTION OM-130.600 SPILL PREVENTION CONTROL, CONTAINMENT AND COUNTERMEASURES PLAN	Page 7 of 9  <b>CONFIDENTIAL</b>
---	--	--

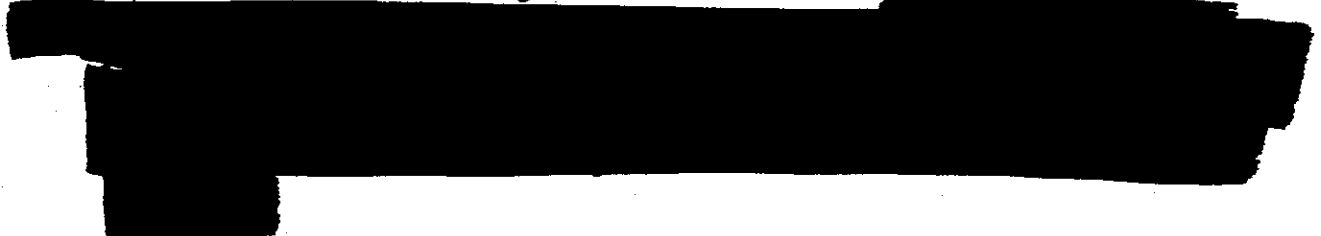
6.11.5 Recordkeeping – records of all unloading activities, inventories, or inspections required by this or other related site procedures shall be created and maintained for a period of at least five years.



6.12 List of spill control and cleanup equipment on site – The following materials are available to control and clean up any spills that may occur. An inventory of these materials will be conducted quarterly.

ITEM	LOCATION
Absorbent pigs	
Absorbent booms	
Oil dry	
Sand	
Empty drums	
Vacuum truck	
Front end loader	
Portable pumps	
Oil Spill Response Kit	

6.13 Emergency Notification and Incident Investigation



6.14 Resumption of Operations



6.15 Training, Drills, Records – All operators, managers, supervisors, and other employees who could reasonably be expected to respond to a spill will receive training on this procedure, operation and maintenance of discharge prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and

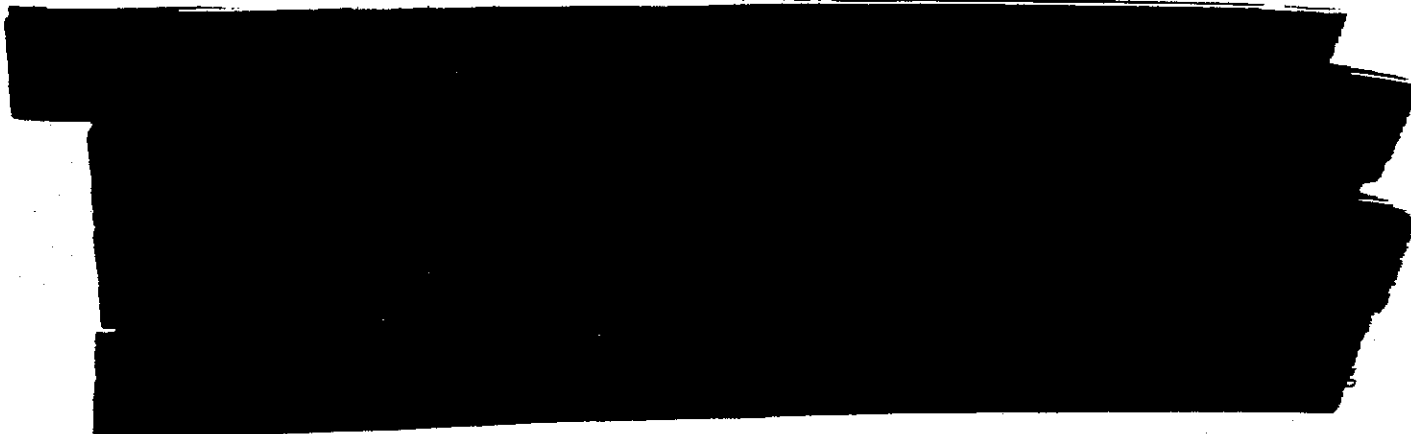
MAINTAINED BY: Environmental Manager  
APPROVED BY: Plant Manager

REVISED DATE: 1/20/05  
EFFECTIVE DATE: 9/27/01



<p>FPC-DE FILE: OM130600 Operations Manual</p>	<p>LEVEL 3 DOCUMENTATION WORK INSTRUCTION OM-130.600 SPILL PREVENTION CONTROL, CONTAINMENT AND COUNTERMEASURES PLAN</p>	<p>Page 8 of 9  <b>CONFIDENTIAL</b></p>
--	---	---

regulations, and general facility operations. Initial training will be conducted within 90 days for new employees who could reasonable be expected to respond to a spill. Refresher training will be conducted on an annual basis, unless changes to the procedure have been made or a spill has occurred which would require more frequent training. Drills are conducted in accordance with the Emergency Response Plan. All records of training and drills will be maintained according to plant record keeping procedures.



- 6.17 Spill History Summary – As of March 3, 2005, there have been no reportable spill incidents at this site during the past three years.

## 7.0 REVIEW SCHEDULE

- 7.1 This procedure will be reviewed and evaluated every three years or as necessary in response to incidents or changes in process equipment or design. All amendments, except changes in personnel or administrative processes, shall be certified by a Professional Engineer.

## 8.0 RECORDS

- 8.1 Records of changes to this procedure are noted in the Revision Log. Notations older than three (3) years may be dropped from the Log.

## 9.0 ATTACHMENT

- 9.1 OM130.600A2 Oil Tank Listing – individual tank spill scenarios
- 9.2 OM130.600A3 Plot Plan with tank locations.
- 9.3 OM130.600A5 List of Transformers and Capacities
- 9.4 OM130.600A6 Certification of Applicability of Substantial Harm Criteria

## 10.0 REVISION LOG

MAINTAINED BY: Environmental Manager  
APPROVED BY: Plant Manager

REVISED DATE: 1/20/05  
EFFECTIVE DATE: 9/27/01

FPC-DE  
FILE: OM130600  
Operations Manual

LEVEL 3 DOCUMENTATION  
WORK INSTRUCTION OM-130.600  
SPILL PREVENTION CONTROL,  
CONTAINMENT AND COUNTERMEASURES  
PLAN

**CONFIDENTIAL**

**11.0 PROFESSIONAL ENGINEER CERTIFICATION**

I have examined the facility and being familiar with the provisions of 40CFR112, I attest that this Spill Prevention, Containment, and Countermeasures Plan has been prepared in accordance with good engineering practices.

Signed by: \_\_\_\_\_ P.E.

Date: \_\_\_\_\_ License No. \_\_\_\_\_

Engineer's Seal affixed below:

Signed and sealed original can be found in the Environmental Department

MAINTAINED BY: Environmental Manager  
APPROVED BY: Plant Manager

REVISED DATE: 1/20/05  
EFFECTIVE DATE: 9/27/01

**CONFIDENTIAL****LIST OF OIL STORAGE TANKS**

Map #	Tank Number & Location	Contents	Capacity (gallons)	Containment/Diversion	Controls/Preventative measures	Potential actions and flow if oil leaks outside secondary containment.
1	PT708A [REDACTED]	Fuel oil	100,000	[REDACTED]	[REDACTED]	[REDACTED]
2	PT708B [REDACTED]	OUT OF SERVICE	125,000	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	Diesel fuel	1,000	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	Diesel fuel	500	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	Diesel fuel	1000	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	Diesel fuel	500	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	Diesel fuel	175	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	Diesel fuel	300	[REDACTED]	[REDACTED]	[REDACTED]
9	PT708C [REDACTED]	Diesel fuel	500	[REDACTED]	[REDACTED]	[REDACTED]
10	[REDACTED]	Motor & lube oils	Various 55 GL drums	[REDACTED]	[REDACTED]	[REDACTED]
11	WT100 Used oil tank	Used motor oils	4,460	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	Gasoline	275 GL	[REDACTED]	[REDACTED]	[REDACTED]

OM130.600 A2 rev. 3 3/3/05

CONFIDENTIAL

**FPC-DE**  
**LIST OF TRANSFORMERS AND CAPACITIES**

	Location	Capacity	Fluid Volume	Fluid type	Drainage, significant spill or leak
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

CONFIDENTIAL

## Section 4. Appendix E

## Substantial Harm Criteria

## Attachment C-II - Certification of the Applicability of the Substantial Harm Criteria

Facility Name:

Facility Address:

1 Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes ☐ No ☒

2 Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes ☐ No ☒

3 Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula <sup>1</sup>) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.

Yes ☐ No ☒

4 Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula <sup>2</sup>) such that a discharge from the facility would shut down a public drinking water intake?

<sup>1</sup> If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup> For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

Yes ☐ No ☒

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes ☐ No ☒

## Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature

Name (please type or print)

Peter Guay

Title

Plant Manager

Date

3/3/05